





GENERAL COUNSEL

To: Office of General Counsel Federal Election Commission 999 E Street, N.W. Washington D.C. 20463

From: Claudette E Curtis

Englewood, Florida 34224

Date: June 19, 2018

Subject: Complaint MUR #7376

I Douglas Curtis Have Answered the questions with regards to the information attached to the best of my knowledge.

I have attached the following Exhibit which is located at the back of my responses.

Exhibit #1 photo of Check register pertaining to amounts in question.

I have ear-marked all questions and remarks I have made and to the best of my knowledge I have answered truthfully and I have kept excellent records and documentations to West Charlotte County Republican Club for the past few years.

We are providing this information to the local party and the Republican Party of Florida for further action if deemed necessary.

Respectfully submitted by

Bob Starr, Chairman of the Audit Committee April 10, 2017

Narrative of the 2016 quarterly Company Treasures Report filed by the Charlotte County Republican Committee on file with the charlotte County Supervisor of Elections

Reporting dates 8/26/2016 through 11/3/2006

Itemized Contributions:

10/24/2016 West Charlotte County Republican Club \$4,196.00
Reimbursement for rent for Englewood Fl. Event Center for federal candidate Donald Trump fund raiser. There was a Rally to get the word out to vote Republican. The \$4,196.00 was the price of renting the Hall, food and soft drinks. The Center where the Rally was held wanted the money upfront so Bill Folchi Chairman of the REC put it on a credit card and at the end of the night I was instructed to reimburse The REC for the \$4,196.00 Check Number 1451 of the West Charlotte County Republican Club. (See Exhibit 1 Check Number 1451. Check was made to the REC)

Violation of the \$500.00 per year max political contribution state statutes and support of federal candidate without proper documentation M/F Bipartisan Campaign Reform Act or other federal laws.

4/22/2016 Charlotte County Republican Club \$5,700.00 Violation of the \$500.00 per year max political contribution in violation of state statutes and possibly used by the CCREC to support Federal Candidate Donald Trump without proper documentation in violation of M/F Bipartisan Campaign Reform act or other federal laws N/A Different club

4/22/2016 West Charlotte County Republican Club \$1,000.00 Violation of the \$500.00 per year max political contribution in violation of state statutes and possibly used by the CCREC to support federal candidate Donald Trump in violation of M/F Bipartisan Campaign Reform Act and other federal laws

6/16/2016 Charlotte County Republican Club \$216.00 Violation of the \$500.00 per year max political contribution in state statutes and possibly used by the CCREC to support a federal candidate Donald Trump in violation of MIF Bipartisan Campaign Reform Act and other federal laws

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8/4/2016 West Charlotte County Republican Club \$1,881.00 Violation of the \$500.00 per year max political contributions in state statutes and possibly used By the CCREC to support a federal candidate Donald Trump in violation of MIF Bipartisan Campaign Reform act. (See Exhibit 1, check numbers 1439 for \$216.00 along with check #1440 \$1,665. The total equals \$1,881.00. Check #1440 was for billboards for 3 months.

Itemized Expenditures:

8/7/2016 ABC Signs & Shirts Promotional Material \$1,201.14 Trump Promotional material Trump Signs etc-I have been told that the material was sold at the REC Headquarters Port Charlotte for cash with no record of who from the public bought the items or how the money from the sales was accounted for. Not West Charlotte Republican Club

8/8/2016 Billboards USA \$5,000.00 Billboards for the election of Donald Trump in Violation of the M/F/BCRA the west Charlotte Republican Club and the Charlotte County Republican Clubs may have contributed funds to the REC for these Billboards. West Charlotte County Republican Club paid \$1,665.00 towards the total bill and this was for 3 months. Approval came from both Ray Corcoran who was Charlotte County Chairman for Donald Trump and the REC Chairman Bill Folchi along with the approval of West Charlotte County Republican Club Board.

8/14/2016 reimbursement to Marilyn Bulifant for grand opening of the Port Charlotte Trump Campaign office \$712.71 Not WCCRC

10/24/2016 Tom Wilson music at TRUMP Picnic \$267.50 possible MIF BCRA or other federal law campaign violation. Not WCCRC

10/24/2016 Marilyn Bulifant \$704.10 reimbursement of expenses for TRUMP picnic possible violation of M/F BCRA or other federal law. Not WCCRC

. 10/27/2016 City of Punta Gorda \$ 171.20 Rental of Park for Trump Picnic possible violation of M/FBCRA or other federal law. Not WCCRC

I have also included a Sun Trust Credit Card statement for the CCREC showing a \$4,196.00 charge to reserve the Englewood events center for a fund raiser for federal candidate Donald Trump Sponsored by Ray Corcoran Trump local Campaign manager and the West Charlotte County Republican Club. Thousands of dollars thousands of dollars were collected for candidate Trump and was sent up to his campaign .See Notes above in (RED) (See Exhibit 1 check number 1439 for \$216.00 for an ad in a newspaper with other clubs).

Additionally three Trump Campaign offices were established in Charlotte County. The Charlotte County Republican Executive Committee was paying the rent and other office expenses, for the Port Charlotte office during the campaign from their operating account not a federal account the Trump Campaign Office may have been in violation of M/F BCRA or other federal laws.

West Charlotte County Republican Club Also had a Trump Campaign office in Englewood Fl. as did the Charlotte County Republican Club in Punta Gorda Fl. I would assume the funds expended by the clubs may have been in violation of M/F BCRA, other federal laws or State Statutes regarding how much organizations can spend in political pursuits currently \$500.00.

January 23, 201B

Dear Chairman Ingoglia:

I am. Contacting you regarding two Republican Party Chartered Clubs in Charlotte County. In 2017 the required audit was completed by Charlotte County REC members. An addendum, to the audit was-submitted to you-as Chairman of RPOF- and as Chairman of the Charlotte County REC, stating that expenditures by the- Charlotte County Republican. Club and the West Charlotte County Republican Club may have been made in violation of state and Federal Campaign finance laws. According to RPOF club chartering conditions any violation of state -or federal law would cause the club charter to be revoked. (See attached copy of CCREC audit),

With my election as Chairman, by the CCREC, in. early March. 20171 began the process of trying the bring the West Charlotte County Republican Club and the Charlotte County Republican Club into compliance with the provisions of their RPOF Charter and state and federal law. This effort has been without success. In fact it has resulted in all- out war, by the two clubs against the CCREC.

The president of the Charlotte County Republican Club Charlie Council sent an email to all club members and others telling them not to attend the--CCREC first fundraising event of 2017, Hog Wild, Pig Roast. The event was a total disaster with very poor attendance. (See attached email) Never received any email saying not to attend — Both my husband and I did attend.

The new President of the Charlotte County Republican -Club, Gene Murtha, as of January 2018, has sent emails calling for meetings to determine which events the CCREC is allowed to have in 2018. (See attached. email)

The West County Republican Doug Curtis President stated in the clubs January News Letter that he is going to have 4 members from the clubs-appointed to the CCREC Board so that the clubs will be able to control the CCREC, (see attached newsletter). Please do read the newsletter see Exhibit 1. He never stated he was going to appoint 4 people he was not even a member of the REC at that time.

Several members of the two Clubs Board of Directors have requested applications to the CCREC. I believe their intent is to disrupt and take over the operation of the CCREC so that the clubs can continue with business as usual. Yes the WCCRC has been trying to get members to join the REC to help build up the club membership as well as fill in the vacancies.

There are many other issues with the two clubs mentioned in this correspondence, which are problematic but do not stand 'in opposition to their charter. Such as raising thousands of dollars using the Republican name when they can only spend \$500.00 in candidate and party support. No nothing about this

With the serious violation of state and federal law and the undermining of the Charlotte County Republican Executive Committee. I would request that the Charlets of the Charlotte County Republican Club and the West Charlotte County Republican Club be invalidated, ASAP by you. This is the only way the CCREC is going to be able to rebuild and. be effective in the future.

Why? Perhaps Mr. Starr should join the club to see what goes on and perhaps visit or just ask to review our books and give some training.

-xhibit 1

18 366 47 18 320 48 1439 * 8-2-16 DATE REC PAYTO FOR CLUB FACE. TOTAL THUS CHECK 2.16 00 OTHER TRANS +/-DEDUCTIBLE 18 18 18 104 1440 8-2-16 PAYTO REC 63269 TOTAL THIB CHECK 1665 OTHER TRANS +/-DEDUCTIBLE BALANCE 13661 50 1451 13 10-18-16 DATE REC PAYTO FOR Event Ctr TOTAL THIS 4196 00. CHECK OTHER TRANS +/-DEDUCTIBLE

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